

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LULAC, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of Texas, *et al.*,

*Defendants.*

Case No.: EP-21-CV-00259-DCG-JES-JVB  
[Lead Case]

***BROOKS* PLAINTIFFS' MOTION TO ENLARGE PAGE LIMIT FOR PRELIMINARY  
INJUNCTION MOTION**

*Brooks* Plaintiffs seek preliminary relief from this Court enjoining Defendants from implementing state Senate District 10 (SD10) as enacted in SB4 because it is infected with intentional racial discrimination. *Brooks* Plaintiffs' proposed Motion for a Preliminary Injunction is filed concurrently herewith.<sup>1</sup>

Under Local Rule CV-7(c)(2), *Brooks* Plaintiffs' Motion would ordinarily be limited to twenty (20) pages. *Brooks* Plaintiffs respectfully seek leave to file the proposed Motion, which does not exceed 47 pages. There is good cause for the requested enlargement of the page limits in light of the serious nature and importance of *Brooks* Plaintiffs' claims, including both their claim for intentional racial discrimination and their claim that race was the predominant districting criterion with respect to SD10. *Brooks* Plaintiffs must demonstrate their likelihood of success on the merits of their claims, both of which require a fact-intensive analysis. Indeed, *Brooks* Plaintiffs' intentional race discrimination claim requires them to make a fact-intensive showing with respect

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<sup>1</sup> Counsel for *Brooks* Plaintiffs contacted counsel for Defendants regarding this motion, but did not receive a response by the time of filing.

to multiple factors. In addition, *Brooks* Plaintiffs must establish that they will be irreparably harmed absent intervention by this Court, and that the balance of the equities and the public interest favor relief. An enlargement of the page limit is necessary to provide the Court with a comprehensive analysis of the weighty constitutional issues raised by Plaintiffs' claims, and the overwhelming factual evidence in support of same. Finally, to aid the Court in its analysis, *Brooks* Plaintiffs have included several comparative maps and images within the body of the motion, which adds substantial length to the document.

For the foregoing reasons, Plaintiffs respectfully request (1) leave for an enlargement of the page limit so as to file the Motion for Preliminary Injunction attached hereto as Exhibit A, (2) the Court enter the proposed order accompanying this motion, and (3) the Court deem the attached Motion for Preliminary Injunction filed.

November 24, 2021

Respectfully submitted,

/s/ Chad W. Dunn

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**CERTIFICATE OF SERVICE**

I certify that all counsel of record were served a copy of the foregoing this 24th day of November, 2021, via the Court's CM/ECF system.

/s/ Chad W. Dunn  
Chad W. Dunn